

EXHIBIT A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB

**DECLARATION OF VERONICA HAYES
GROMADA SUPPORTING
DEFENDANTS' MOTION FOR
SANCTIONS AGAINST BRET STANLEY**

Judge: Hon. Lisa J. Cisneros
Courtroom: G-15th Floor

1 I, Veronica Hayes Gromada, declare:

2 1. I am a partner at the law firm of Shook, Hardy & Bacon, L.L.P. I am a member
3 in good standing of the Bars of the State of Texas and of the District of Columbia and am
4 admitted to practice *pro hac vice* before this Court. I know the following facts to be true of my
5 own knowledge, except those matters stated to be based on information and belief. If called
6 upon to testify, I could and would testify competently to the truth of the matters stated herein. I
7 respectfully submit this declaration in support of Defendants' Motion for Sanctions Against
8 Bret Stanley. I have also reviewed the accompanying Declaration of Greg Brown.

9 Defendants Produced A VFB Analysis In The MDL
10 And Designated It Confidential Under The Protective Order

11 2. Defendants produced UBER_JCCP_MDL_003941399 (the "VFB Analysis") in
12 this MDL and designated it Confidential under the Protective Order. As a member of the PSC,
13 Mr. Stanley has direct access to the MDL repository of more than 1.8 million documents,
14 including the VFB Analysis.

15 Mr. Stanley Searched the MDL Discovery Repository
16 Using The UUID Of An Uber Eats Earner Involved In A Non-MDL Case And
17 Used The VFB Analysis He Found To Litigate His Non-MDL Case

18 3. Mr. Stanley is counsel of record for the plaintiff in *Smith v. Uber Technologies,*
19 *Inc., et al.*, 2022-CI-11011 (Bexar County, Texas), which concerns an automobile accident that
20 occurred in April 2022. Angela Angotti of Bowman and Brooke, LLP is Defendants' counsel
21 of record in *Smith*. Ms. Angotti provided me with email correspondence between her, Mr.
22 Stanley, and other counsel of record in *Smith*.

23 4. As the plaintiff's counsel in *Smith*, Mr. Stanley propounded a request for
24 production seeking "documents that indicate [REDACTED]
25 [REDACTED]." As established by the Declaration of
26 Greg Brown, Defendants have no record of any [REDACTED] for Mr. Aldana.

27 5. Yet, in a November 13, 2025 email to Ms. Angotti, Mr. Stanley claimed that he
28 knew [REDACTED] existed for Mr. Aldana "based on documents related to Aldana's

¹ Defendants have omitted Mr. Aldana's UUID from this quotation because, as Mr. Stanley's actions here demonstrate, UUIDs should be treated as confidential information.

1 UUID.” Mr. Stanley also accused Ms. Angotti of making “a substantial misrepresentation” to
2 the *Smith* court:

3 Importantly, RFP 70 was granted and Uber is to produce [REDACTED]
4 [REDACTED] related to Aldana. On the record you made a
5 substantial misrepresentation that Uber has **no** [REDACTED]
6 **for Aldana**. This is absolutely untrue based on documents
7 related to Aldana’s UUID. The Order granting RFP 70 allows
8 me to trigger procedures in the MDL Protective Order to seek
9 this production.

10 See Exhibit 1, email thread between Mr. Stanley and Ms. Angotti (Mr. Stanley’s November 13,
11 2025 email at 8:53 am).

12 6. Following Mr. Stanley’s accusations, Ms. Angotti searched and located no
13 information supporting Mr. Stanley’s accusation. Accordingly, Ms. Angotti asked Mr. Stanley
14 to “identify the Aldana UUID documents mentioned in your November 13 email...by bates
15 number....” Exhibit 1, email thread between Mr. Stanley and Ms. Angotti (Ms. Angotti’s
16 November 18, 2025 email at 4:13 pm).

17 7. Mr. Stanley responded that the document “**is from MDL 3084....**” Exhibit 1,
18 email thread between Mr. Stanley and Ms. Angotti (Mr. Stanley’s November 18, 2025 email at
19 4:55pm). Mr. Stanley suggested that attorneys who have access to the MDL repository “**could**
20 **search MDL Database using Aldana’s UUID and it will populate.**”² *Id.* (emphasis added).
21 Mr. Stanley claimed the VFB Analysis “indicates [REDACTED] for the *Smith* Earner
22 (Aldana) and was, thus, responsive to RFP 70. *Id.* Mr. Stanley also continued to assert that “a
23 false statement to the court was made” by Defendants’ *Smith* counsel. *Id.*

24 8. Mr. Stanley later provided the Bates number of the Confidential MDL document
25 allegedly supporting his claims, which was VFB Analysis:

26 ² Notably, Mr. Stanley’s co-counsel in another non-MDL case, *Lord v. Uber Technologies, Inc.*,
27 which has been pending since February 2024, asked the driver defendant’s counsel for the driver’s
28 UUID on November 4, 2025. See Exhibit 3, November 4, 2025 letter from Mr. Stanley’s co-
counsel requesting the *Lord* driver’s UUID.

From: Bret Stanley <BStanley@johnsonlawgroup.com>
 Sent: Tuesday, November 25, 2025 4:11 PM
 To: Angela Angotti <Angela.Angotti@bowmanandbrooke.com>
 Subject: RE: Smith - Motion to Extend Docket Control Order

Thanks.

UBER_JCCP_MDL_003941399



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Mr. Stanley never sought, let alone received, permission from either Defendants or the Court to: (a) search the MDL discovery repository—which is comprised largely of Defendants’ Confidential and Highly Confidential MDL documents—using Mr. Aldana’s UUID; or (b) use the VFB Analysis to litigate the *Smith* case.

Mr. Stanley Challenged Defendants’ Confidential Designation Of The VFB Analysis, But Withdrew His Challenge With Prejudice

9. On October 16, 2025, Bret Stanley challenged Defendants’ confidential designation of UBER_JCCP_MDL_003941399, titled “TNA-4142 | [REDACTED] VFB Logistic Flow List to Audit” (hereinafter, “VFB Analysis”). See Exhibit 2, October 16, 2025 Bret Stanley email. Mr. Stanley’s challenge asserted that the VFB Analysis “does not qualify under the definition contained in Paragraph 2.3 of Pretrial Order 4 [sic],” but did not provide any description of the basis for the challenge. *Id.*

10. During the required conferral with Mr. Stanley, Defendants identified all the reasons the VFB Analysis was confidential. Mr. Stanley never sought either Defendants’ or this Court’s permission to use the VFB Analysis in *Smith* or any other case. Instead, Mr. Stanley claimed—incorrectly and without explanation—that the VFB Analysis did not fall into any of the categories of information that can be designated Confidential under the Protective Order.

1 Defendants advised Mr. Stanley that his challenge was frivolous. On November 12, 2025, Mr.
 2 Stanley withdrew his confidentiality challenge to the VFB Analysis, with prejudice. ECF 4366
 3 at 3.³

4 Defendants Met And Conferred With Mr. Stanley Regarding His Recent Smith Conduct

5 11. With ample evidence that Mr. Stanley once again violated the Protective Order,
 6 Defendants, through MDL counsel, sent Mr. Stanley a Cease and Desist Letter on December 2,
 7 2025. Defendants requested a meet and confer and advised of their intent to proceed with motion
 8 practice.

9 12. On December 8, 2025, Defendants' counsel met and conferred with Mr. Stanley
 10 regarding this dispute. Defendants explained that searching the MDL discovery repository using
 11 the *Smith* Earner's UUID was a clear violation of the Protective Order. **Mr. Stanley did not**
 12 **deny that he searched the MDL discovery repository using the *Smith* Earner's UUID.**
 13 Instead, Mr. Stanley simply claimed that he did not "disclose" the VFB Analysis in the *Smith*
 14 matter. However, as explained above, Mr. Stanley plainly used information in the VFB Analysis
 15 to litigate the *Smith* matter. Moreover, the parties are clearly at an impasse regarding whether
 16 Mr. Stanley is permitted to search the MDL discovery repository for documents that may be
 17 helpful in his non-MDL matters.

18 I declare under penalty of perjury that the foregoing is true and correct.

19 Executed this 8th day of December, 2025 in Houston, Texas.

20
 21 /s/ Veronica Hayes Gromada
 22 Veronica Hayes Gromada
 23
 24
 25

26 ³ Pursuant to the Protective Order, Mr. Stanley may use the VFB Analysis within the MDL or
 27 JCCP litigation. But there is no reason for Mr. Stanley to do so, as the document focuses
 28 exclusively on auditing the Uber Eats program, a program that is not at issue in this MDL or the
 JCCP. Indeed, the VFB Analysis does not involve incidents of alleged sexual assault or sexual
 misconduct.